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 Gary L. Gassman, SBN 032271
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Attorneys for Sonesta International Hotels Corporation

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF ARIZONA**

DONNA A. McDUFF,

Plaintiff,

v.

SONESTA INTERNATIONAL HOTELS
 CORPORATION, a Maryland corporation
 dba SONESTA ES SUITES; JOHN DOE
 AND JANE DOE EMPLOYEE; JOHN
 DOES I-V; JANE DOES I-V; fictitious
 individual; ABC CORPORATIONS and/or
 PARTNERSHIPS and/or SOLE
 PROPRIETORSHIPS and/or JOINT
 VENTURES, I-X; fictitious entitles,

Defendants.

Case No.: 22-cv-

**REMOVED FROM THE SUPERIOR
 COURT OF STATE OF ARIZONA,
 COCONINO COUNTY**

Case No.: S0300CV202200545

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332(a), 1441(a) and 1446, Defendant, SONESTA INTERNATIONAL HOTELS CORPORATION (“SONESTA”), hereby removes this action to the United States District Court for the District of Arizona. In support of its Notice of Removal, SONESTA states the following:

State Court Action and Timely Removal

1. On November 9, 2022, Plaintiff, Donna A. McDuff (“PLAINTIFF”) filed Case No. S0300CV202200545 in the Superior Court of Coconino County, Arizona. A true and accurate copy of Plaintiff’s complaint is attached as Exhibit A.

2. The complaint alleges negligence and premises liability arising out of PLAINTIFF's alleged trip and fall at a hotel owned and operated by SONESTA. Ex. A.

3. SONESTA received the complaint on November 29, 2022 and the removal, which is occurring within 30 days of SONESTA's receipt of the complaint, is therefore timely under 28. U.S.C. § 1446(b)(1).

Complete Diversity Exists

4. At all times relevant, PLAINTIFF was a resident of Maricopa County, Arizona. Ex. A, ¶ 3.

5. At all times relevant, SONESTA was a citizen of Maryland, with its principal place of business in Newton, Massachusetts. *See* Declaration of Gary Gassman, attached as Exhibit B.

6. The underlying lawsuit is between a plaintiff-citizen of Arizona and a defendant-citizen of Maryland and Massachusetts and therefore, complete diversity exists between the parties pursuant to 28. U.S.C. § 1332(a)(1).

Amount in Controversy

7. 28 U.S.C. § 1446(c)(2)(A)(ii) permits a defendant to assert the amount in controversy where the amount is not stated in the state court pleading.

8. PLAINTIFF'S complaint alleges that the actions is claiming more than \$50,000 and less than \$300,000 in damages. Ex. A, ¶ 2.

9. PLAINTIFF seeks an award of medical and related expenses incurred to date and future medical expenses; reasonable value of mileage expense; reasonable value of PLAINTIFF'S current and future loss of income and earning capacity; past and future loss of earnings; and costs and expenses incurred in bringing the action. Exhibit A.

10. The district court determines whether defendant has met this burden by first considering whether it is "facially apparent" from the complaint that the jurisdictional amount has been satisfied. *Singer v. State Farm Mut. Auto. Ins. Co.*, 116 F.3d 373, 377 (9th Cir.1997). If the complaint does not clearly specify damages, the court may examine facts in the complaint and evidence submitted by the parties. *Matheson v. Progressive Specialty*

1 *Ins. Co.*, 319 F.3d 1089, 1091 (9th Cir. 2003). A settlement letter may provide a reasonable
 2 estimate of plaintiff's claim. *See Cohn v. Petsmart, Inc.*, 281 F.3d 837, 840 (9th Cir. 2002)
 3 (a settlement letter is relevant evidence of the amount in controversy if it reflects a
 4 reasonable estimate of the plaintiff's claim). Prior to filing suit, Plaintiff made a settlement
 5 demand in excess of \$75,000 to resolve her claims against SONESTA. Exhibit B.

6 11. Therefore, the amount in controversy exceeds \$75,000 and satisfies 28 U.S.C.
 7 § 1332(a)(1).

8 **Notice to Plaintiff and State Court**

9 12. A Notice of Filing of this Notice of Removal will be filed with the Superior
 10 Court of Coconino County, Arizona contemporaneously with the filing of this Notice of
 11 Removal in accordance with 28 U.S.C. § 1446(b), and written notice of the filing of this
 12 Notice of Removal will be served upon PLAINTIFF'S counsel. A copy of the Notice of
 13 Filing of Notice of Removal is attached as Exhibit C.

14 13. SONESTA demands a trial by jury on all issues triable by jury.

15 WHEREFORE, pursuant to 28 U.S.C. §§ 1332(a), 1441(a) and 1446, Defendant,
 16 SONESTA INTERNATIONAL HOTELS CORPORATION, removes this case to the
 17 United States District Court for the District of Arizona, for all further proceedings in this
 18 matter.

19
 20 Dated: December 19, 2022

Respectfully submitted,

21 /s/ Julie L. Trester

22 Julie L. Trester, Esquire, 013107

(jtrester@cozen.com)

23 Gary L. Gassman, Esquire, SBN 032271

(ggassman@cozen.com)

24 123 North Wacker Drive, Suite 1800

25 Chicago, IL 60606

26 Telephone: 312-474-7900

27 Fax: 312-706-9708

Attorneys for Defendant

Sonesta International Hotels Corporation

CERTIFICATE OF SERVICE

I, Julie L. Trester, hereby certify that on December 20, 2022, I filed Defendant SONESTA INTERNTIONAL HOTEL COPRORATION's Notice of Removal with the United States District Court for the District of Arizona using the Court's ECF filing system and that all counsel of record be served via certified and electronic mail.

/s/ Julie L. Trester

Julie L. Trester

Gary L. Gassman

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Chicago, IL 60606

jtrestre@cozen.com

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Attorney for Defendant

Sonesta International Hotel Corporation

COZEN O'CONNOR
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SUITE 1800
CHICAGO, ILLINOIS 60606



Notice of Service of Process

Transmittal Number: 25977765
Date Processed: 12/01/2022

Primary Contact: Jennifer Clark
The RMR Group LLC
255 Washington St
Ste 300
Newton, MA 02458-1634

Electronic copy provided to: Camille Balletto

Entity:	Sonesta International Hotels Corporation Entity ID Number 3081376
Entity Served:	Sonesta International Hotels Corporation, dba Sonesta Es Suites
Title of Action:	Donna A McDuff vs. Sonesta International Hotels Corporation, dba Sonesta Es Suites
Matter Name/ID:	Donna A McDuff vs. Sonesta International Hotels Corporation, dba Sonesta Es Suites (13278890)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Coconino County Superior Court, AZ
Case/Reference No:	S0300CV202200545
Jurisdiction Served:	Arizona
Date Served on CSC:	11/29/2022
Answer or Appearance Due:	20 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Goldberg & Osborne 602-808-6300

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

Person/Attorney Filing: Amanda L Boardman
Mailing Address: 698 E Wetmore Rd Ste 200
City, State, Zip Code: Tucson, AZ 85705
Phone Number: (602)808-6331X6331
E-Mail Address: aboardman@goldbergandosborne.com
[] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030061, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCONINO

Donna A McDuff

Plaintiff(s),

v.

Sonesta International Hotels
Corporation, DBA Sonesta Es Suites
Defendant(s).

Case No. | S0300CV202200545

SUMMONS

To: Sonesta International Hotels Corporation, DBA Sonesta Es Suites

WARNING: THIS AN OFFICIAL DOCUMENT FROM THE COURT THAT AFFECTS YOUR RIGHTS. READ THIS SUMMONS CAREFULLY. IF YOU DO NOT UNDERSTAND IT, CONTACT AN ATTORNEY FOR LEGAL ADVICE.

1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers were served on you with this Summons.
2. If you do not want a judgment taken against you without your input, you must file an Answer in writing with the Court, and you must pay the required filing fee. To file your Answer, take or send the papers to Clerk of the Superior Court, 200 N. San Francisco St., Flagstaff, Arizona 86001 or electronically file your Answer through one of Arizona's approved electronic filing systems at <http://www.azcourts.gov/efilinginformation>.
Mail a copy of the Answer to the other party, the Plaintiff, at the address listed on the top of this Summons.
Note: If you do not file electronically you will not have electronic access to the documents in this case.
3. If this Summons and the other court papers were served on you within the State of Arizona, your Answer must be filed within TWENTY (20) CALENDAR DAYS from the date of service, not counting the day of service. If this Summons and the other court papers were served on you outside the State of Arizona, your Answer must be filed within THIRTY (30) CALENDAR DAYS from the date of service, not counting the day of service.

Requests for reasonable accommodation for persons with disabilities must be made to the court by parties at least 3 working days in advance of a scheduled court proceeding.

GIVEN under my hand and the Seal of the Superior Court of the State of Arizona in and for the County of COCONINO

SIGNED AND SEALED this date: *November 9, 2022*

Valerie Wyant
Clerk of Superior Court

By: *LECLARK*
Deputy Clerk



FILED
Valerie Wyant
CLERK, SUPERIOR COURT
11/09/2022 11:23AM
BY: LECLARK
DEPUTY

Case No.: S0300CV202200545
HON. TED REED

GOLDBERG & OSBORNE
2815 S. Alma School Rd., #122
Mesa, Arizona 85210
Phone: (602) 808-6300
Amanda L. Boardman #030061
aboardman@1800theeagle.com
Attorney for Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCONINO

DONNA A. MCDUFF, an individual,

Plaintiff,

vs.

SONESTA INTERNATIONAL HOTELS
CORPORATION, a Maryland corporation
dba SONESTA ES SUITES; JOHN DOE
AND JANE DOE EMPLOYEE; JOHN
DOES I-V; JANE DOES I-V, fictitious
individuals; ABC CORPORATIONS and/or
PARTNERSHIPS and/or SOLE
PROPRIETORSHIPS and/or JOINT
VENTURES, I-X; fictitious entities.
Defendants.

NO: _____

COMPLAINT
(Premises Liability)

TIER II

Plaintiff, DONNA A. MCDUFF, by and through counsel undersigned, for her
Complaint, alleges as follows:

1. Venue and jurisdiction are proper in Coconino County, Arizona.
2. Discovery Tier: Pursuant to Arizona Rules of Civil Procedure, Rule 26.2(c)(3) the
Court should assign this case to the following tier based on the amount of damages
requested.

☐ Tier 1 = Actions claiming \$50,000.00 or less in damages.

☒ Tier 2 = Actions claiming more than \$50,000.00 and less than \$300,000.00 in damages, or actions claiming non-monetary relief.

☐ Tier 3 = Actions claiming \$300,000.00 or more in damages.

3. Plaintiff Donna A. McDuff is a resident of Maricopa County, Arizona.

4. Upon information and belief, Defendant Sonesta International Hotels Corporation is a Maryland corporation doing business as Sonesta ES Suites and is authorized to do and is doing business in the State of Arizona and caused an event to occur in Arizona that is the subject of Plaintiff's Complaint herein.

5. Upon information and belief, Defendant Sonesta International Hotels Corporation is in the business of owning and operating hotels.

6. Upon information and belief, JOHN DOE EMPLOYEE and JANE DOE EMPLOYEE, were a married couple at all times relevant hereto and residents of Coconino County, Arizona. The true identity of JOHN DOE EMPLOYEE and JANE DOE EMPLOYEE are presently unknown to Plaintiff, and Plaintiff will seek leave to amend her Complaint when their true identities are ascertained. Upon information and belief, at all times alleged herein, Defendant JOHN DOE EMPLOYEE was acting individually and on behalf of any furtherance of his marital community with JANE DOE EMPLOYEE.

7. Upon information and belief, Plaintiff alleges that at the time of the events set forth in this Complaint, Defendants JOHN DOE EMPLOYEE and JANE DOE EMPLOYEE were employees, servants and/or agents of Defendant Sonesta International Hotels Corporation and was acting within the course and scope of employment or under their

1 direction and control, or under such circumstances as to justify imputing responsibility for
2 the careless and/or negligent and/or reckless acts complained of herein to Defendants
3 under the principles of respondeat superior.
4

5 8. All acts complained of herein occurred in furtherance of the Defendants' marital
6 community. Defendants JOHN and JANE DOES I through V, ABC CORPORATIONS
7 I-X and/or PARTNERSHIPS I-X are corporations, business entities, persons, agents
8 servants or employees whose true names are not now known to Plaintiff. To the extent of
9 discovery to be conducted, Plaintiff alleges that JOHN and JANE DOES I through V,
10 ABC CORPORATIONS I-X and/or PARTNERSHIPS I-X are residents of the County of
11 Coconino, State of Arizona and they caused events to occur in the State of Arizona out of
12 which Plaintiff's cause of action arose. Plaintiff requests leave of Court to amend the
13 Complaint once the true identities of these Defendants become known to Plaintiff.
14
15

16
17 9. The Plaintiff is informed, believes and thereupon alleges that the Defendants
18 designated as Does I-V and/or ABC CORPORATIONS I-X and/or PARTNERSHIPS I-
19 X, inclusive, are anyone of the following:
20

21 a. Parties responsible in some manner for the events and happenings herein
22 referred to that caused injuries and damages proximately thereby to the Plaintiff as
23 herein alleged.
24

25 b. Parties that are the agents, servants, employees and/or contractors of the
26 Defendants, each of them acting within the course and scope of their agency,
27 employment or contract.
28

1 c. Parties that own, lease, manage, operate, secure, inspect, repair, maintain
2 and/or are responsible for the Defendants vehicle and/or business referred to
3 hereinafter; or
4

5 d. Parties that have assumed or retained liabilities if any of the Defendants by
6 virtue of agreement, sale, transfer or otherwise.
7

8 10. The corporate Defendants, if any, are believed to be authorized, and are doing
9 business in Arizona.

10 11. The amount of controversy satisfies the jurisdiction requirements of the Superior
11 Court.
12

13 **GENERAL ALLEGATIONS**

14 12. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 11
15 above as though fully set forth herein.
16

17 13. Upon information and belief, Defendant Sonesta International Hotels Corporation
18 (hereinafter "Sonesta ES Suites) is the owner of the real property located at 1400 North
19 Country Club Drive, Flagstaff, Arizona 86004 more commonly known, and doing
20 business as Sonesta ES Suites.
21

22 14. On November 13, 2020, Plaintiff was a business invitee at Sonesta ES Suites.

23 15. On said date, Plaintiff was walking from the hotel room to her vehicle when she
24 tripped and fell on the outdoor concrete slab walkway. As a result, Plaintiff sustained
25 serious personal injuries.
26

27 ///

COUNT I – NEGLIGENCE

16. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 15 as though fully set forth herein.

17. The trip and fall occurred in a common area owned, controlled, managed, and maintained by the Defendants.

18. The Defendants were responsible for the premises, including, without limitation, the maintenance and upkeep of the premises.

19. At the time of the incident, Defendant JOHN DOE AND JANE EMPLOYEE was acting in the course and scope of his employment with Defendants.

20. Defendants are legally responsible for the acts of Defendant JOHN DOE AND JANE DOE EMPLOYEE under the doctrine of respondeat superior.

21. Defendants negligently performed their duties, including, but not limited to failing to repair and/or maintain their walkways for an unreasonably long period of time.

22. The incident was caused by the negligent and careless manner in which the Defendants failed to maintain the premises, failed to warn the Plaintiff of the unreasonably dangerous condition, failed to inspect the premises for unreasonably dangerous conditions, and failed to take reasonable measures to protect the Plaintiff from the dangerous condition.

23. The premises and/or area were defective and unreasonably dangerous at the time of Plaintiff's trip and fall and the defective premises and/or area caused Plaintiff the injuries set forth herein.

1 24. The Defendants, in whole or part, were in control and legally responsible for the
2 premises, including and without limitation, the area where Plaintiff's fall occurred and
3 were responsible for the dangerous condition present on the premises.
4

5 **COUNT II – PREMISES LIABILITY**

6 25. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 24
7 as though fully set forth herein.
8

9 26. The Defendants knew or should have known of the unreasonably dangerous
10 condition of the walkway.
11

12 27. Defendants are charged with notice by virtue of that agency.

13 28. Defendants failed to repair the unsafe sidewalk, failed to maintain the premises,
14 failed to warn the Plaintiff of the unreasonably dangerous condition, failed to inspect the
15 premises for unreasonably dangerous conditions, and failed to take reasonable measures to
16 protect the Plaintiff and its business invitees.
17

18 29. Defendants are liable for Plaintiff's injuries occurring as a result of Plaintiff's trip
19 and fall on the defective walkway on their premises.
20

21 **COUNT III - DAMAGES**

22 30. Plaintiff re-alleges each and every allegation contained in paragraphs 1 through 29
23 as though fully set forth herein.
24

25 31. As a direct and proximate result of the wrongful acts of Defendants, Plaintiff
26 sustained injuries which have resulted in considerable pain, suffering, inconvenience,
27 permanent scarring, functional impairment, disfigurement, emotional distress, and loss
28 of enjoyment of life, loss of income, and may cause future pain and suffering.

1 32. As a further direct and proximate result of the negligence of Defendants, Plaintiff
2 has incurred medical and related expenses for care and treatment and may incur such
3 expenses in the future.
4

5 33. As a further direct and proximate result of Defendants' negligence, Plaintiff has
6 incurred mileage expenses from traveling to and from appointments with medical
7 providers.
8

9 34. As a further direct and proximate result of the negligence of Defendants, Plaintiff
10 has lost earnings and may incur a future impairment to earning capacity.
11

12 **WHEREFORE**, Plaintiff requests judgment against Defendants, as follows:

- 13 1. For general damages in a fair and reasonable amount.
- 14 2. For the reasonable value of Plaintiff's medical and related expenses incurred to
15 date and any future expenses.
- 16 3. For the reasonable value of Plaintiff's mileage expenses.
- 17 4. For the reasonable value of Plaintiff's current and future loss of income and
18 earning capacity.
- 19 5. For Plaintiff's past and future loss of earnings.
- 20 6. For Plaintiff's costs and expenses incurred to date, and to be incurred in the future
21 in this action; and
- 22 7. For such other and further relief that the Court deems just and proper.
23
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///

1 DATED this 9th day of November, 2022.

2 **GOLDBERG & OSBORNE**

3
4 /s/ Amanda Boardman

5 _____
6 Amanda L. Boardman, Esq.
7 *Attorney for Plaintiff*
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FILED
Valerie Wyant
CLERK, SUPERIOR COURT
11/09/2022 11:23AM
BY: LECLARK
DEPUTY
Case No.: S0300CV202200545
HON. TED REED

Person/Attorney Filing: Amanda L Boardman
Mailing Address: 698 E Wetmore Rd Ste 200
City, State, Zip Code: Tucson, AZ 85705
Phone Number: (602)808-6331X6331
E-Mail Address: aboardman@goldbergandosborne.com
[☐] Representing Self, Without an Attorney
(If Attorney) State Bar Number: 030061, Issuing State: AZ

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCONINO

Donna A McDuff
Plaintiff(s),

Case No.

v.

Sonesta International Hotels
Corporation, DBA Sonesta Es Suites
Defendant(s).

**CERTIFICATE OF
COMPULSORY ARBITRATION**

I certify that I am aware of the dollar limits and any other limitations set forth by the Local Rules of Practice for the Coconino County Superior Court, and I further certify that this case IS NOT subject to compulsory arbitration, as provided by Rules 72 through 77 of the Arizona Rules of Civil Procedure.

RESPECTFULLY SUBMITTED this

By: Amanda L Boardman /s/
Plaintiff/Attorney for Plaintiff

Julie L. Trester, 013107
 Gary L. Gassman, SBN 032271
 COZEN O'CONNOR
 123 North Wacker Drive, Suite 1800
 Chicago, IL 60606
 Telephone: 312.474.7900
 Toll Free Phone: 877.992.6036
 Facsimile: 312.382.8910

Attorneys for Sonesta International Hotels Corporation

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 Defendants.

**REMOVED FROM THE SUPERIOR
 COURT OF STATE OF ARIZONA,
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Case No.: S0300CV202200545

DECLARATION OF GARY L. GASSMAN

I, Gary L. Gassman, declare as follows:

1. I am a citizen of the United States of America, over the age of eighteen (18) years, and I am fully qualified and competent to make this Declaration.

2. I am one of the attorneys for Defendant, SONESTA INTERNATIONAL HOTELS CORPORATION ("SONESTA") in this matter. I have personal knowledge of the facts set forth in this Declaration.

Corporations Division

Business Entity Summary

ID Number: 001064628[Request certificate](#)[New search](#)**Summary for: SONESTA INTERNATIONAL HOTELS CORPORATION****The exact name of the Foreign Corporation:** SONESTA INTERNATIONAL HOTELS CORPORATION**The name was changed from:** SONESTA ACQUISITION CORP. **on** 02-22-2012**Entity type:** Foreign Corporation**Identification Number:** 001064628**Old ID Number:****Date of Registration in Massachusetts:**
11-07-2011**Last date certain:****Organized under the laws of:** State: MD **Country:** USA **on:** 10-31-2011**Current Fiscal Month/Day:** 09/30**Previous Fiscal Month/Day:** 09/30**The location of the Principal Office:**

Address: 400 CENTRE STREET

City or town, State, Zip code, NEWTON, MA 02458 USA

Country:

The location of the Massachusetts office, if any:

Address:

City or town, State, Zip code,

Country:

The name and address of the Registered Agent:

Name: CORPORATION SERVICE COMPANY

Address: 84 STATE ST.

City or town, State, Zip code, BOSTON, MA 02109 USA

Country:

The Officers and Directors of the Corporation:

Title	Individual Name	Address
PRESIDENT	JOHN G MURRAY	TWO NEWTON PLACE, 255 WASHINGTON STREET NEWTON, MA 02458 USA
TREASURER	STEPHEN P MIANO	400 CENTRE STREET NEWTON, MA 02458 USA
SECRETARY	JENNIFER B CLARK	400 CENTRE STREET NEWTON, MA 02458 USA
VICE PRESIDENT	BRADFORD P MAXWELL	400 CENTRE STREET NEWTON, MA 02458 USA
VICE PRESIDENT	KEITH J PIERCE	400 CENTRE STREET NEWTON, MA 02458 USA

VICE PRESIDENT	VERA N MANOUKIAN	400 CENTRE STREET NEWTON, MA 02458 USA
DIRECTOR	ADAM D PORTNOY	400 CENTRE STREET NEWTON, MA 02458 USA
DIRECTOR	JENNIFER B CLARK	400 CENTRE STREET NEWTON, MA 02458 USA
DIRECTOR	JOHN G MURRAY	TWO NEWTON PLACE, 255 WASHINGTON STREET NEWTON, MA 02458 USA

Business entity stock is publicly traded: ☐

The total number of shares and the par value, if any, of each class of stock which this business entity is authorized to issue:

Class of Stock	Par value per share	Total Authorized		Total issued and outstanding
		No. of shares	Total par value	No. of shares

--

☐**Consent**☐**Confidential
Data**☐**Merger
Allowed**☐**Manufacturing**

View filings for this business entity:

ALL FILINGS
 Amended Foreign Corporations Certificate
 Annual Report
 Annual Report - Professional
 Application for Reinstatement
 Articles of Consolidation - Foreign and Domestic

View filings

Comments or notes associated with this business entity:

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New search

Julie L. Trester, 013107
Gary L. Gassman, SBN 032271
COZEN O'CONNOR
123 North Wacker Drive, Suite 1800
Chicago, IL 60606
Telephone: 312.474.7900
Toll Free Phone: 877.992.6036
Facsimile: 312.382.8910

Attorneys for Sonesta International Hotels Corporation

SUPERIOR COURT OF THE STATE OF ARIZONA
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DOES I-V; JANE DOES I-V; fictitious
individual; ABC CORPORATIONS and/or
PARTNERSHIPS and/or SOLE
PROPRIETORSHIPS and/or JOINT
VENTURES, I-X; fictitious entitles,

Defendants.

Case No.: S0300CV202200545

**SONESTA INTERNATIONAL
HOTELS CORPORATION'S
NOTICE OF FILING NOTICE OF
REMOVAL**

PLEASE TAKE NOTICE that Defendant, SONESTA INTERNATIONAL HOTELS
COPRORATION ("Sonesta"), has on this date filed a Notice of Removal of this case from the
Superior Court of Coconino County, Arizona, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446,
containing a statement of facts which entitle this matter to be removed to the United States District
Court for the District of Arizona. The grounds for this removal are set forth in the Notice of
Removal, a copy of which is attached as Exhibit "1," which includes a copy of the Complaint that
was served upon Defendant.

1 DATED: December 20, 2022

COZEN O'CONNOR

2
3 By: Julie L. Trester

4 Julie L. Trester, Esq., 013107

5 Gary L. Gassman, Esq., SBN 032271

6 *Attorney for Sonesta International Hotels*
7 *Corporation*
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COZEN O'CONNOR
123 NORTH WACKER DRIVE
SUITE 1800
CHICAGO, ILLINOIS 60606

CERTIFICATE OF SERVICE

I, Julie L. Trester, hereby certify that on December 20, 2022, I caused to be served a true and correct copy of the foregoing Notice of Filing Notice of Removal upon the following counsel via email, with a copy also sent via regular US Mail:

Amanda L. Boardman
Goldberg & Osborne
2815 S. Alma School Rd, #122
Mesa, Arizona 85210
aboardman@1800eagle.com

By: Julie L. Trester
Julie L. Trester, Esq., 013107
Gary L. Gassman, Esq., SBN 032271

Attorney for Sonesta International Hotels Corporation